

Maine Wind Working Group dba



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Regarding and Attention: Comments on Draft Wind Energy Guidelines as noticed in the Federal Register on February 18, 2011 and March 2, 2011

Rowan Gould, Director

U.S. Fish and Wildlife Service

Division of Fisheries and Habitat Conservation

4401 North Fairfax Drive

Mail Stop 4107

Arlington, VA 22203-1610

Dear Sir:

By way of introduction, I am the Coordinator of the Maine Wind Working Group in Maine which is one of 32 state-based groups across the U.S. whose aim is to educate and inform the public about wind power. We are sponsored by the *Wind Powering America Program* at the National Renewable Energy Laboratory.

It has recently come to our attention that your department's Draft Land-Based Wind Energy Guidelines (Guidelines) has been released for public comment. Please hereby find our comments to those Guidelines.

We urge you to recall your recently released Guidelines and to adopt the Federal Advisory Committee (FAC) recommendations that were so painstakingly, and thoroughly, developed after nearly three years of science-based analysis of bird and other wildlife issues that were identified by you and others in the federal government to analyze. In addition, we urge you to revise the 2009 permit rules so that the Eagle Guidance program is no more stringent than the Endangered Species Act.

A tremendous amount of work went into the FAC process, which was lead by some of our nation's leading facilitators and experts in the topic, and which relied solely on peer-reviewed science. Here in Maine, we have over 2000 mw in the pipeline for wind power development

which would be significantly and negatively impacted by the current Guidelines, if adopted. Those projects and others would likely have long delays in state and federal permitting and in some cases, could even be permanently killed if the Guidelines are finalized and implemented. The fact of the matter is that state law and policy here in Maine already requires a thorough investigation of potential impacts to birds and other wildlife and is already adequately and reasonably addressing wildlife concerns from wind turbines and projects.

Lastly, we are particularly concerned that the Guidelines do not make distinctions between projects of different sizes or scales. Thus, based on that, it is clear that small, medium, and community wind projects would be even more disadvantaged by the requirements posed in the Guidelines than larger projects. This regulation alone would kill more of these projects than any other factor affecting them – which would be a terrible outcome to the current trend toward smaller, more efficient community wind projects and the growing market transformation of our small and medium wind turbine manufacturing industries.

Time is of the essence to clarify the set of wildlife impact requirements for wind projects. With current energy and electricity prices and our nation's lack of a comprehensive energy policy, we must streamline and make efficient our permitting and regulatory requirements for the wind industry. Our industry has progressed remarkably fast within the last decade, and has been a responsible and willing player in thoroughly addressing all negative impacts of wind turbines and projects, including to wildlife. To adopt the Guidelines would be a step backward in the industry's quest to provide the nation with cleaner, greener source of power as quickly and efficiently as possible.

Very truly yours,

A handwritten signature in black ink that reads "Susan Jones". The script is cursive and fluid, with the first name "Susan" and last name "Jones" clearly legible.

Susan Jones

Maine Wind Working Group